

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

VINCENT HANDSFORD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE NO.
	)	1:19-cv-05746-JPB-RDC
SHERIFF LEVON ALLEN,	)	
in his official capacity,	)	
	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR LEAVE TO  
DEPOSE FEDERAL INMATE VICTOR HILL**

COMES NOW Plaintiff Vincent Handsford, pursuant to Fed. R. Civ. P. 30(a)(2)(B), and files this motion for leave to depose federal inmate Victor Hill, the former Sheriff of Clayton County, Georgia, showing the Court as follows:

1. By this motion, Plaintiff seeks leave to take the deposition of the former Sheriff of Clayton County, Georgia, Victor Hill (“Hill”), who is confined in federal prison at FCI Forest City Low, located at 1400 Dale Bumpers Road, Forrest City, Arkansas 72335.
2. Pursuant to Fed. R. Civ. P. 30(a)(2)(B), “A party must obtain leave of court, and the court must grant leave to the extent consistent with Rule 26(b)(1) and (2): [ ] if the deponent is confined in prison.”

3. Defendant does not oppose relief sought herein.
4. The deposition of Hill is necessary for the prosecution of Plaintiff's case, as Hill was the decisionmaker for each of the adverse employment actions of which Plaintiff complains, and Hill possesses admissible evidence which is not otherwise available.
5. Accordingly, Plaintiff respectfully requests that this Court grant him leave take the deposition of Hill.

WHEREFORE Plaintiff respectfully requests the entry of an Order: (i) granting Plaintiff leave to take the deposition of Hill; and (ii) for such other and further relief as this Court deems just and proper. A proposed order is attached for the Court's consideration.

Respectfully submitted this 5th day of June, 2023.

**BUCKLEY BALA WILSON MEW LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2023, I electronically filed the above **PLAINTIFF’S MOTION FOR LEAVE TO DEPOSE FEDERAL INMATE VICTOR HILL** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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